

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

BRODIE, J.

TISCIONE, M.J.

Jean - Gaspere Pierre

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Law Firm Littler Mendelson, P.C.

Re: Craig R. Benson -

Re: Hema Chittani -

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

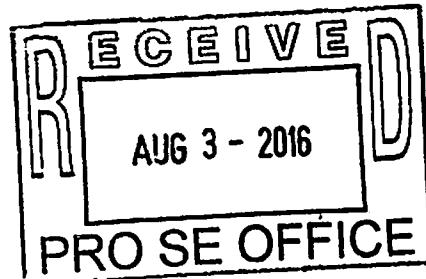
**CV 16**

Case No.

**4364**

(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)



**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Jean-Gespre Pierre</u>
Street Address	<u>795 Lexington Ave, 2nd Floor</u>
City and County	<u>Brooklyn NY</u>
State and Zip Code	<u>11221</u>
Telephone Number	<u>(917) 340-7804 or 347-622-8771</u>
E-mail Address	<u>Jpierre11225@gmail.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Law Firm Littler Mendelson P.C. Re:</u>
Job or Title (if known)	<u>Craig R. Benson - Court Reporter</u>
Street Address	<u>900 Third Ave, New York, NY 10022</u>
City and County	<u>New York, NY</u>
State and Zip Code	<u>10022 -</u>
Telephone Number	<u>(212) 583-9600 or Fax 718-732-2369-</u>
E-mail Address (if known)	<u>c.benson@littler.com</u>

**Defendant No. 2**

Name	<u>Hema Chotani -</u>
Job or Title (if known)	<u>Lawyer</u>
Street Address	<u>900 Third Ave</u>
City and County	<u>New York NY</u>

State and Zip Code N.Y. 10022  
Telephone Number (212) 583-9600  
E-mail Address heltzani@littler.com  
(if known)

Defendant No. 3

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Under CPLR 3126 - "Common law of Spoliation" And  
• Misconduct Professional - See, Education law -  
Violation in my Rights of 14<sup>th</sup> Amendment and 4<sup>th</sup> Amendment

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

(a) If the plaintiff is an individual

The plaintiff, (name) Victor - Gisiane Lorie, is a citizen of the State of (name) Haiti (Port Au Prince)

(b) If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Craig R. Benson, is a citizen of the State of (name) ?. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Mendelson Law Firm P.C., is incorporated under the laws of the State of (name) New York, NY, and has its principal place of business in the State of (name) Manhattan 900 - 3rd Ave. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Because I have Case with my former Employer  
AirServ of American Airlines, for 3 Counts of more  
\$75,000. Then Craig R. Benson offered me \$5,000 for drop it or my case

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I have had a deposition with this Law Firm Mendelson P.C. Rep-by  
Craig R. Benson, and with his Lawyer Hema Chotani at 900  
third Ave, New York, NY 10022 or Manhattan on date April 29, and  
May 18, 2015- See Exhibits NO 1, 2, 3, 4, 5 and 6 =  
Both together offered me \$5,000 to drop my Case and fraudulent my transcript -

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Because they are fraudulent my transcript on the Deposition,  
and tried to put me down on my case with my former Employer Air-Serv -  
I lost my house on the Auction, I was unable to pay rent  
since 2014 to now - I can't find job quickly - I owed money  
on Job Collector, State Target, Chase State Bank, and others -

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: August 3rd, 2016 8:01.

Signature of Plaintiff

Jean G. Davis

Printed Name of Plaintiff

Jean - G. Davis



Littler Mendelson, PC  
900 Third Avenue  
New York, NY 10022-3298

June 12, 2015

Hema Chatlani  
212.583.2674 direct  
212.583.9600 main  
646.607.3583 fax  
hchatlani@littler.com

**VIA FEDEX**

Jean G. Pierre  
795 Lexington Avenue, 2nd Floor  
Brooklyn, NY 11221  
917-340-7804

Re: Pierre v. Air Serv, Case No. 14-cv-5915

Dear Mr. Pierre:

Enclosed please find a copy of your deposition transcripts from your April 29 and May 18, 2015 depositions. Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure, please review the transcripts and determine if any changes should be made in form and substance. Rule 30(e) provides that you have 30 days from the date of this letter to review the transcript and to provide corrections. Any changes should be made on the Errata Sheets (beginning on pages 111 and 245), and should be noted by identifying the page and line numbers together with the appropriate correction as well as the reason for the change.

Whether or not any corrections are required, please sign the errata sheet and the original transcript before a Notary Public, and return both to me by July 13, 2015.

Necessary changes or changes to form should include typographical errors as well as any language clarification. Please note that any substantive changes to your testimony, such as changing a "yes" to a "no" could result in your further deposition, will be included as part of the official record with the Court, and may be used to impeach your testimony at a later date. *See Podell v. Citicorp Diners Club, Inc.*, 112 F.3d 98, 103 (2d Cir. 1990) ("when a party amends his testimony under Rule 30(e), 'the original answer to the deposition questions will remain part of the record and can be read at the trial'").

Sincerely,

  
Hema Chatlani  


Hema Chatlani

Enclosures

cc: Craig R. Benson, Esq.



Littler Mendelson, PC  
900 Third Avenue  
New York, NY 10022-3298

November 6, 2014

Craig R. Benson  
212.583.2682 direct  
212.583.9600 main  
718.732.2369 fax  
cbenson@littler.com

**VIA ECF**

Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Jean Pierre v. Airserv Security, 14-CV-5915 (MKB)(LB)

Dear Judge Brodie:

This law firm has been recently retained to represent Defendant in the above-referenced matter. We respectfully request an extension of time for Defendant to investigate the allegations in Plaintiff's Complaint and answer, move against, or otherwise respond to the Complaint, from November 10, 2014 to December 1, 2014. This is Defendant's first request for an extension of time, and the extension will not affect any other scheduled dates.

Pursuant to Your Honor's Individual Motion Practices and Rules, we contacted *pro se* plaintiff Jean G. Pierre to ask if he would consent to Defendant's request for an extension. Mr. Pierre neither consented nor objected to Defendant's request, and instead stated that he needed more information before he could respond.

The undersigned thanks the Court for its consideration of this request, and is available should the Court have any questions.

Respectfully submitted,

*/s/ Craig R. Benson*

Craig R. Benson  
CRB/sl

cc: Jean G. Pierre, *pro se* (via U.S. mail)

U.S District Court  
Eastern District of New York (Brooklyn)

Jean- Gespere Pierre

Plaintiff-

Vs.

Airserv Security % American Airlines

Defendant-

Notice to Judge Chambers MKB

Plaintiff requests pre-motion  
conference case #1:14-CV-05915-  
MKB

Date Filed: 10/08/2014

N. Civil Rights : Job #442

Jean-Gespere Pierre Plaintiff vs. Airserv Security / American Airlines Defendants

Notice to Judge Chamber MKB

Plaintiff requests pre-motion conference Case # 1:14-CV-05915-MKB

Dated file: 10/08/2014

N. Civil Rights: Jobs #442

To: Hon. Judge Marko K. Brodie – U.S. District Court n – New York

I am writing to your honor pursuing to Your Honor's Individual Practices to respectfully request a Pre-motion Conference to consolidate my case written above caption which was followed by an answer of "Bill of Particulars" since April 29, 2015 on deposition and interrogatories that have been held at the Defendants' Counsel location site of 900 Third avenue, New York, NY 10022. Represented by Craig R. Benson- Litter Mendelson, P.C.

Lead by Attorney Mrs. Hema Chatlani. Both Attorney and law firm Mendelson, P.C. Litter Mendelson of Mr. Craig R.Benson , have violated the rules of professional misconduct on the transcript of the deposition held on date April 29, and May 18, 2015. Then required to sign the erata sheet and transcript before a notary public, and return both to them by July 13, 2015

**2.) MEMORANDA-LAW:** Because Court system with its Judges based on the legal issues or the law of the state, local and the federal. But the factual issues are the Province of the court should be on

the eyes of Jury's comments for evidences. The law of evidences with its principles are based on the judicial advisory Committee on Evidence rule-see, Evidences on Federal Rules and Regulation.

"Free" Fed.R. Evid. 103 For Example; Fed 402-Fre1002-Fre 702; and Fre501 which recognizes evidentiary Privilege, but leaves it to the federal judges ( that is, to decisional or common law) to determine the existence and scope of Federal privileges. See, Fre801-802.

Definition and General Considerations on Evidentiary Rules by Prince Richardson in Article I- States:<< The Preservation rule is necessary for several reasons. Under article VI<sup>83</sup> of New York State Constitution, the Court of Appeals, with limited exception, is empowered to consider only "question of law" see, (people v/s. Belge, 41NY2d60).

The chief purpose of demanding notice through objection or motion in a trial court, as with any specific objections, is to bring the claim to the trial Court's attention.

A several motion fails at this task (People v/s. Narayan, 54NY2d106). As practical matter, a general motion to dismiss is often no more helpful to the trial judge than would be a motion predicated on an erroneous ground. A sufficient specific motion might provide the opportunity for cure before a verdict is reached and a cure is no longer possible (see, e.g., CPL 260.30[7]).

3) Merit Amendment – Some showing required ; see,CPLR3035(b)specifies that courts should the movant must provide evidentiary showing that the proposed amendment has arguable merit.See,Milkis v/condominium Lloyd54Condominium, 24Misc.3d56,884NYS.2d547- (App.Term.1<sup>st</sup> Dept., 2009.)

4)Finally; "Bill of Particulars" Under CPLR 3042 (B, a party is entitled to amend the Bill of Particulars once, as of right, regardless of the timing, as long as the Note of Issue has been filed.

See, Dubose vs. New York City Transit Authority, 248 A.D. 2d 235, 670 NY 5.2d32 (1<sup>st</sup> dept., 1998) – and also (Dubose Vs. NYHHC, 229 A.D. 2d 312, 645 N.Y.S. 2d18 (1st Dept. ; 1996)

See appendixes #A, B, C, D, E...

Thank You,

JG.Pierre(911)340-7804 or  
Jean G. Pierre 347-622-9271

Jean G. Pierre  
795 Lexington Avenue, 2<sup>nd</sup> Floor  
Brooklyn, NY 11221

November 23, 2015

U.S. District Court  
Eastern District Of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

Attn: Pro Se Office

Dear Judges of Governing U.S. District Court, Eastern District of New York, Attn. Pro Se Office.

This letter and law suit is a formal complaint against Law Firm "Littler Mendelson, located at 900 Third Avenue, New York, NY 1002-3198  
C/o Craig R. Benson, (212) 583-2682 or (212) 583-9600.  
Re; ~~Mema~~ Chatlani, Attorney, Airserv Security (212) 583-2674 or (212) 583-9600.

On April 27 and May 18<sup>th</sup>, 2015, I was in the office for Deposition of my case with my former employer, "Airserv Security" Pursuant to Rule30,(a) of the Federal Rules of Civil Procedure. I was been interviewed 2 times with Mr. Benson, and a trans later for Mrs. Doreland who did'nt translated correctly my answers to Mr. Benson, then she seemed not to be qualified for the job.

During this interviewed and interrogation, I believed I was asked a lot of questions on several times in a same manner and some of them are illegal and irrelevant or inadmissible and times were gone for 2 days without a good meeting of depository or interrogatory.

By June 12, 2015, the Attorney and Mr. Benson sent me a transcript with more than 500 pages with one for corrections, and most of interviewed words are missing, and falsifying, with fraud..... illegality with an affidavit to sign-up before a Notary.

I replied from to this Transcript which illegally fraud and responding to Complaint to the Judge of U.S.E. District Court. Informing the Court that the Law Firm of "Littler Mendelson, P.C. cc: Craig R. Benson violated the law of New York Federal Rules, Law and Regulation they have committed a crime against the State and Federal as

a collateral crime. I request from the authority of this Court to prosecute and charge this law firm of a of Little Mendelson, P.C. for criminal activities and felonies.

Why I charge this office Law Firm of a violations of U.S. Federal, Law, Rules and Regulations . These charges to be investigated and institute to legal proceedings, if appropriate on my behalf, seeking justice and relief from this matter.

See references of Federal Rules and Regulations Laws, (404)-(/a (b) Collateral Crimes Evidence – On Charge Misconduct Violations.

Professional – As a deceitful, treacherous, and obsessively ambitious.

Then by habit evidence – Routine Practice of this organize of this Law Firm, wrongful acts should be punished by the law as Punitive Damage until to put in jail. See again Federal Rules (404) – (a (b)).

See Federal Rules, against Conspiracy Section 13.1 in Act of Congress – Rule (702) – Federal Rules against Dishonesty or False Statement in Rules (609) (b) (2) is a crime involving deceit, falsification and untruthfulness, all these acts apply to punishment, Medelson (Little) PC., Cc: Craig R. Benson

I will be grateful in you can respond by my Email, at Jpiere11225 @ ..... com  
Very truly yours,

Jean G. Pierre

*Jean G. Pierre*

*Dec 16<sup>th</sup>, 2015*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

JEAN - GESPÈRE PIERRE

Plaintiff,

-against-

AIRSERV SECURITY

Defendants.

----- X  
#1:14 - CV-05915- (MKB)-LB

PLAINTIFF'S  
AFFIDAVIT/AFFIRMATION  
IN OPPOSITION TO  
DEFENDANT'S MOTION

STATE OF NEW YORK)

SS.

COUNTY OF Kings)

I Jean - G. Pierre, affirms the following  
under penalty of perjury:

or

being duly sworn, deposes and says:

1. I am the plaintiff in this action, and I respectfully submit this affidavit/affirmation in opposition to the motion dated June 19, 2015, made by The Defendant Airserv Security
2. I have personal knowledge of facts which bear on this motion.
3. The motion should be denied because The Defendant have forges fed more than 3 times to responding to the what the Judge Lois Blooms required - See, First demand of defendant on November 10, 2014 to December 1<sup>st</sup>, 2014 - Second demand on June 9, 2015 - Then Requested a promotion Conference on July 16, 2015 before the Judge Margo K. Brodia - Entered on July 7, 2015 -  
See, other Copies of letters that supports the Motion should be denied -

(You may use additional 8 1/2 x 11 paper if needed)